

# McKool Smith

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February 22, 2025

By ECF

The Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, New York 10007

Re: AMJ Global Entertainment LLC v. Migom Global Corp., et al.  
24 Civ. 6600 (VSB)

Dear Judge Broderick:

This firm represents Johann Gudenus, one of the individual defendants in the above-referenced action. We were retained as of February 21, 2024.

The Court will recall that we previously filed a notice of appearance for Defendants Juergen Blaha and Michael Herzer.

We respectfully submit this letter-motion, pursuant to Section I.G of your Honor's Individual Rules & Practices in Civil Cases.

The Court previously ordered, upon their request, that Defendants Blaha and Herzer have until **March 3, 2025**, to move, answer, or otherwise respond to the Corrected Class Action Complaint, filed on September 13, 2024 (ECF No. 7) (the "Complaint"), and until **March 31, 2025**, to file any papers in connection with the pending motion for the appointment of lead plaintiff and lead counsel. ECF No. 34.

To permit counsel to properly consult with Gudenus, by whom we were only recently retained, we respectfully request that the Court extend these dates by two weeks, such that Defendants Blaha, Herzer, and Gudenus move, answer, or otherwise respond to the Complaint on or before **March 17, 2025**, and file any papers in connection with the pending motion for the appointment of lead plaintiff and lead counsel on or before **April 14, 2025**.

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The Honorable Vernon S. Broderick  
February 22, 2025  
Page 2

Consent of Plaintiff's counsel was sought by e-mail on February 21, 2025, but no response to the request was received as of the filing of this letter-motion.

We submit that a modest extension of two weeks is necessary to analyze the Complaint on behalf of now three defendants, to determine how to proceed, including what Rule 12(b) or other motions might be made, and to prepare the necessary materials. In addition, filing a consolidated set of papers on behalf of all three defendants at once will greatly simplify matters for the Court and the parties.

We submit that no prejudice to Plaintiff would result from the requested extension. As of the date of this letter-motion and based on a review of the docket sheet, five individual defendants has not yet been served or attempted to be served. In addition, as of today, neither Defendants Migom Global Corp. nor Migom Bank Ltd. has responded to the Complaint and the Court has scheduled various default judgment related proceedings. ECF No. 44.

Counsel for Blaha, Herzer, and Gudenus is available at the Court's convenience for a pre-motion conference if necessary.

Respectfully submitted,

/s/

Daniel W. Levy

Cc: All Counsel (via ECF)

Blaha, Herzer, and Gudenus shall move, answer, or otherwise respond to the Complaint on or before March 17, 2025.

Blaha, Herzer, and Gudenus shall file any papers in connection with the pending motion for the appointment of lead plaintiff and lead counsel on or before April 14, 2025.

This matter is referred to me for general pretrial supervision, and this letter motion falls within the scope of the reference. The letter motion is GRANTED. Defendants Blaha, Herzer, and Gudenus shall move, answer, or otherwise respond to the Complaint on or before **March 17, 2025**, and they shall file any papers in connection with the pending motion for the appointment of lead plaintiff and lead counsel on or before **April 14, 2025**. The Clerk of Court is respectfully requested to terminate ECF 48.

Date: 2/25/2025  
New York, NY

SO ORDERED

  
ROBYN F. TARNOFSKY  
UNITED STATES MAGISTRATE JUDGE